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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR
INTERIM COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
BY APPLICANTS FROM AUGUST 1, 2021 THROUGH NOVEMBER 30, 2021**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his

undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On March 3, 2022, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from August 1, 2021 through November 30, 2021 (the "Fee Applications"). These Fee Applications include the following:

- A. Thirty-Eighth Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2021 through November 30, 2021 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 8/1/2021 to 11/30/2021, fee: \$32,681,351.79, expenses: \$377,823.57 (Filed: 3/3/2022) [ECF No. 21212]
- B. Application of Schiltz & Schiltz as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2021 through November 30, 2021 for Schiltz & Schiltz, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$105,110.27, expenses: \$6,832.17 (Filed: 3/3/2022) [ECF No. 21213]
- C. Application of Soroker Agmon Nordman as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2021 through November 30, 2021 for Soroker Agmon Nordman, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$683,984.36, expenses: \$27,694.39 (Filed: 3/3/2022) [ECF No. 21214]
- D. Application Of Graf Isola Rechtsanwälte GmbH as Special Counsel to the Trustee for Allowance of Interim Compensation Incurred from August 1, 2021 through November 30, 2021 for Graf & Isola Rechtsanwälte GmbH, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$9,963.97, expenses: \$0.00 (Filed: 3/3/2022) [ECF No. 21215]
- E. Thirty-Third Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2021 through November 30, 2021 for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$143,636.13, expenses: \$730.24 (Filed: 3/3/2022) [ECF No. 21216]
- F. Application of UGGC & Associés as Special Counsel to the Trustee for Allowance of Interim Compensation Incurred from August 1, 2021 through

November 30, 2021 for UGGC & Associates, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$31,461.66, expenses: \$0.00 (Filed: 3/3/2022) [ECF No. 21217]

- G. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2021 through November 30, 2021 for Browne Jacobson, LLP, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$209,908.77, expenses: \$27,903.25 (Filed: 3/3/2022) [ECF No. 21218]
- H. Thirteenth Application of Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2021 through November 30, 2021 for Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$52,175.25, expenses: \$464.91 (Filed: 3/3/2022) [ECF No. 21219]
- I. Thirty-Seventh Application of Windels Marx Lane & Mittendorf, LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2021 through November 30, 2021 for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$1,794,869.00, expenses: \$3,826.72 (Filed: 3/3/2022) [ECF No. 21220]
- J. Sixteenth Application of Kelley, Wolter & Scott, Professional Association as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2021 through November 30, 2021 for Kelley, Wolter & Scott, Professional Association, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$1,800.00, expenses: \$0.00 (Filed: 3/3/2022) [ECF No. 21221]
- K. Application of Monfrini Bitton Klein as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Incurred from August 1, 2021 through November 30, 2021 for Monfrini Bitton Klein, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$92,690.25, expenses: \$0.00 (Filed: 3/3/2022) [ECF No. 21222]
- L. First Application of Bowman and Brooke LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from October 8, 2021 through November 30, 2021 for Bowman and Brooke, Special Counsel, period: 10/8/2021 to 11/30/2021, fee: \$9,262.50, expenses: \$526.90 (Filed: 3/3/2022) [ECF No. 21223]
- M. Application of Velitor Law as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2021 through November 30, 2021 for Velitor Law, Special Counsel, period: 8/1/2021 to 11/30/2021, fee: \$24,461.10, expenses: \$0.00 (Filed: 3/3/2022) [ECF No. 21224]

- N. First Application of Lukins & Annis P.S. as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from September 16, 2021 through November 30, 2021 for Lukins & Annis P.S., Special Counsel, period: 9/16/2021 to 11/30/2021, fee: \$1,692.90, expenses: \$0.00 (Filed: 3/3/2022) [ECF No. 21225]

2. The deadline for filing objections to the Fee Applications expired on April 6, 2022 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for April 20, 2022 at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the "Notice Order"), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the Acting United States Attorney for the Southern District of New York; and (vi) SIPC.

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Fee Applications appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the "Order") that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: April 8, 2022
New York, New York

By: /s/ David J. Sheehan
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*Attorneys for Plaintiff Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
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